UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO. 00-6345-CR-DIMITROULEAS

GARY TODD LEFTON

DEFENDANT'S MOTION FOR ENLARGEMENT OF TIME TO FILE PRETRIAL MOTIONS

OF THE BY

DEFENDANT'S MOTION FOR ENLARGEMENT OF TIME TO FILE PRETRIAL MOTIONS

Defendant, Gary Todd Lefton, through his undersigned counsel, moves for thirty day enlargement of time in which to file pretrial motions on the following grounds:

- On February 20, 2001, counsel formally entered a not guilty plea on behalf of her client, Gary Todd Lefton. On that date, the court entered the Standing Discovery Order which requires all pretrial motions to be filed within twenty-eight days thereof.
 - 2. As a result, pretrial motions in this matter are due on March 20, 2001.
- Counsel for the Defendant is scheduled to commence a four week trial on March 19, 2001 before the Honorable Kenneth L. Ryskamp, in *United States v. Thomas* Bauer, Case No. 99-6195-CR-Ryskamp.
- 4. As a result of the aforementioned and other previously scheduled matters, counsel has not had sufficient time to review the discovery and discuss potential pretrial motions with her client.
- Counsel discussed this proposed enlargement of time with Assistant
 United States Attorney Kathleen Rice who advised that she does not oppose the relief



CASE NO. 00-6345-CR-DIMITROULEAS

requested herein.

WHEREFORE, Defendant, Gary Todd Lefton, respectfully requests this court to enter an order enlarging the time within which motions may be filed through and including April 19, 2001.

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed this Lay of March, 2001 to Kathleen Rice, Assistant Untied States Attorney, 500 E. Broward Blvd., Fort Lauderdale, FL 33394.

GRILLI & CORVATO, P.A. Attorney for Defendant

2455 Hollywood Boulevard

Hollywood, FL 33020

Fax (954) 453 1179

Kathleen Cooper Grilli